

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

AT CHARLESTON

UNITED STATES OF AMERICA,

VS.

CASE NO. 2:18-cr-00261

JUANITA CARRIE HAYNES,

DEFENDANT.

MOTION FOR COMPASSIONATE RELEASE

Now comes the Defendant, Juanita Carrie Haynes, by counsel, Timothy J. LaFon, and files this Motion for Compassionate Release pursuant to 18 U.S.C. §3582 in that the Defendant has extraordinary and compelling reasons for release as outlined in the Memorandum of Law filed contemporaneously herewith.

WHEREFORE, the Defendant requests the Court enter an Order granting her Motion for Compassionate Release, releasing her to Supervised Release, or at the very least, to home confinement, and setting this matter for Hearing if the Court so desires. The Defendant requests such other and further relief as this Court deems just.

JUANITA CARRIE HAYNES

By Counsel,

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
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CERTIFICATE OF SERVICE

I, Timothy J. LaFon, do hereby certify that the foregoing “**Motion for Compassionate Release**” has been served upon all parties via the Court’s electronic filing system on the 23rd day of December 2021:

Drew O. Inman, Esq.
United States Attorney’s Office
P.O. Box 1713
Charleston, West Virginia 25326-1713

CICCARELLO, DEL GIUDICE & LAFON

By: /s/Timothy J. LaFon
Timothy J. LaFon (WV #2123)
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